BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2014-346-WS

IN RE:	Application of Daufuskie Island Utility)	DAUFUSKIE ISLAND UTILITY
	Company, Incorporated for Approval of)	COMPANY, INC.'S RESPONSES
	An Increase for Water and Sewer Rates,)	TO SOUTH CAROLINA OFFICE
	Terms and Conditions-Second Remand)	OF REGULATORY STAFF'S
)	FIRST CONTINUING REQUEST
)	FOR PRODUCTION OF THE
		_)	SECOND REMAND

TO: ANDREW M. BATEMAN, ESQUIRE, ATTORNEY FOR THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF ("ORS")

Daufuskie Island Utility Company, Inc. ("DIUC") hereby responds to The South Carolina Office of Regulatory Staff's ("ORS") First Continuing Request for Production of the Second Remand pursuant to S.C. Code Ann. § 58-4-55 (Supp. 2019), 58-5-230, S.C. Code Regs., 103-517, and 103-719 as follows:

ORS Request 1-1

Please provide all documents that support Rate Case Expenses of \$269,356 as identified in the Second Rehearing Direct Testimony of John F. Guastella (p. 17, l. 6) including, but not limited to, the calculation, reconciliation and vendor invoices.

(a) Please provide all documentation to demonstrate the invoices that are included in the amount of \$269,356 have been paid by DIUC.

RESPONSE:

DIUC objects to this Request because it is unduly burdensome and because in direct contradiction of a ruling of the South Carolina Supreme Court, the Request seeks to impose a higher level of scrutiny and an increased burden of production regarding the extensive documentation DIUC has already provided to ORS and to the Commission regarding DIUC's Rate Case Expenses. *See DIUC v. S.C. Office Reg. Staff*, 427 S.C. 458, 462-3, 832 S.E.2d 572, 574 (2019), *reh'g denied* (Sept. 27, 2019) (hereinafter "*DIUC II*"). Subject to and preserving its objections, DIUC responds as follows:

Documents supporting the Rate Case Expenses sought by DIUC were produced with DIUC's Responses to Office of Regulatory Staff's First Continuing Audit Information Request in Proceeding on Remand dated October 27, 2017 and Attachment to ORS 1-12 Rate Case Expenses therewith produced. DIUC also previously provided ORS and the Commission support for its requested Rate Case Expenses, through testimony and exhibits. *See* Transcript of Proceedings (October 28, 2015), Transcript of Proceedings (December 6 and 7, 2017), Prefiled Second Rehearing Testimony of John F. Guastella (June 16, 2020). DIUC incorporates and relies upon these documents and transcripts. Provided herewith is a one-page chart entitled GA Rate Case Invoices and Payments to Date. Additional testimony and documents may also be provided as this second rehearing proceeding continues, including future testimony, both prefiled and live testimony, and exhibits.

Respectfully submitted,

/s/ Thomas P. Gressette Jr.

Thomas P. Gressette, Jr. Direct: (843) 727-2249

Email: Gressette@WGFLLAW.com

G. Trenholm Walker

Direct: (843) 727-2208

Email: Walker@WGFLLAW.com

WALKER GRESSETTE FREEMAN & LINTON, LLC

Mail: P.O. Box 22167, Charleston, SC 29413 Office: 66 Hasell Street, Charleston, SC 29401

Phone: (843) 727-2200

July 10, 2020 Charleston, South Carolina

Attachments:

Verification

GA Rate Case Invoices and Payments to Date (July 10, 2020)

VERIFICATION

I, John F. Guastella, General Manager of Daufuskie Island Utility Company, hereby affirm that the foregoing DAUFUSKIE ISLAND UTILITY COMPANY, INC.'S RESPONSES TO SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIRST CONTINUING REQUEST FOR PRODUCTION OF THE SECOND REMAND are true and accurate to the best of my knowledge based on my understanding of the questions.

John F. Guastella

SWORN to before me this day of July, 2020.

Notary Public for Ft. Palm. Beach Co My Commission Expires: Til 2, 2022 Notary Public State of Florida Cameron G Reese My Commission GG 351377 Expires July 2, 2023

GA Rate Case Invoices and Payments to Date

GA Consulting - Rate Case Docket No 2014-346-WS	<u>Invoice No.</u>	<u>Due</u>	<u>Paid</u>
Invoiced 7.10.14	133	\$ 1,612.50	12.1.14
Invoiced 9.5.14	139	\$ 16,687.50	12.1.14
Invoiced 10.14.14	145	\$ 5,130.00	12.1.14
Invoiced 11.11.14	151	\$ 13,122.50	8.22.18
Invoiced 12.9.14	165	\$ 14,600.00	8.22.18
Invoiced 1.5.15	170	\$ 19,932.50	8.22.18
Invoiced 2.10.15	179	\$ 25,239.02	8.22.18
Invoiced 3.6.15	184	\$ 15,692.50	8.22.18
Invoiced 4.8.15	192	\$ 4,792.50	8.22.18
Invoiced 5.20.15	204	\$ 17,992.50	8.22.18
Invoiced 6.5.15	209	\$ 19,067.48	8.22.18
Invoiced 7.1.15	211	\$ 53,810.00	8.22.18
Invoiced 8.10.15	215	\$ 67,860.00	8.22.18
Invoiced 10.14.15	223	\$ 19,870.00	8.22.18
Invoiced 11.9.15	228	\$ 82,695.34	10.10.19
Invoiced 12.11.15	232	\$ 37,812.50	11.16.19
Invoiced 1.6.16	236	\$ 17,412.50	11.16.19
Invoiced 2.4.16	242	\$ 14,652.50	3.18.20
Invoiced 3.12.16	247	\$ 3,772.50	3.26.20
Invoiced 5.16.16	259	\$ 5,562.50	3.26.20
Invoiced 6.21.16	263	\$ 8,522.50	3.26.20
Invoiced 7.13.16	269	\$ 5,617.50	3.26.20
Invoiced 8.12.16	274	\$ 2,537.50	3.26.20
Invoiced 9.6.16	277	\$ 15,357.50	3.26.20
Invoiced 11.18.16	288	\$ 1,307.50	6.26.20
Invoiced 1.9.17	292	\$ 22,117.50	6.26.20
Invoiced 7.17.17	327	\$ 7,825.00	6.26.20
Invoiced 8.18.17	333	\$ 2,325.00	
Invoiced 9.15.17	335	\$ 9,700.00	
Invoiced 10.17.17	337	\$ 10,351.25	
Total as of November 1, 2017		\$ 542,978.09	

Amoujnt Paid to date \$ 520,601.84

Note: Does not include subsequent billings.

CERTIFICATE OF SERVICE

This is to certify that on July 10, 2020, I caused to be served upon the counsel of record named below a copy of the foregoing **DAUFUSKIE ISLAND UTILITY COMPANY**, **INC.'S RESPONSES TO SOUTH CAROLINA OFFICE OF REGULATORY STAFF'S FIRST CONTINUING REQUEST FOR PRODUCTION OF THE SECOND REMAND** via electronic mail, as indicated. A copy of the Responses were also filed via the Commission's DMS.

Andrew M. Bateman, Esq. (abateman@ors.sc.gov)
Jeff Nelson, Esq. (jnelson@ors.sc.gov)
John J. Pringle, Jr., Esq. (jack.pringle@arlaw.com)
John F. Beach, Esq. (john.beach@arlaw.com)